

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b)) RM-8416
Table of Allotments FM) MM Docket No. 94-29
Broadcast Stations (Willows)
and Dunnigan, California))
TO: Chief, Mass Media Bureau

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REPLY TO OPPOSITION TO PETITION FOR RECONSIDERATION

Marysville Radio, Inc. ("MRI") and Roseville Radio, Inc. ("RRI"), acting pursuant to Section 1.429(g) of the Commission's rules, hereby reply to the opposition (the "Opposition") of Pacific Spanish Network, Inc. ("PSN") to MRI's and RRI's Petition for Reconsideration (the "Petition") of the Bureau's Report and Order ("R&O") in the above-referenced docket.¹ Amendment of Section 73.202(b), DA 95-2149 (MMB Oct. 24, 1995).

Introduction

PSN's Opposition confirms the merits of the Petition. The Opposition focuses on alleged procedural irregularities that do not exist and caused no prejudice to PSN, responds to arguments that were never made in the Petition, makes factual assertions which are not and cannot be supported by the record, and most importantly, sidesteps the basic criteria which the Bureau is obligated to employ in deciding whether to make the allotment requested by PSN.

¹ MRI and RRI have been reorganized under one umbrella corporation, EMI Sacramento Radio, Inc. ("EMI"). All references to petitioners will therefore be to EMI.

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The lack of merit in PSN's Opposition -- and the fundamental flaw in the R&O -- is reflected in PSN's failure to cite any prior case in which the Commission authorized an allotment comparable to the one proposed by PSN. The absence of any precedent is hardly surprising. PSN proposes to strip Willows of its only nighttime service and leave that community of 10,000 people to serve a community with a population of 700. That kind of move would not comport with good business -- if, as the R&O presumes, PSN were not interested in serving the surrounding Urbanized Areas.

The reality, of course, is otherwise. PSN's obvious goal is not to better serve the tiny town of Dunnigan but to capture greater advertising revenues from the more populous Urbanized Areas which surround Dunnigan. Application of the Commission's standard criteria -- Dunnigan's proximity to central cities, the coverage of PSN's proposed signal over the Urbanized Areas, and Dunnigan's interdependence with the surrounding Urbanized Areas -- confirm that the Dunnigan move-in is not a preferential arrangement but the kind of move toward larger population centers which the Commission said it would not sanction. New Community of License, 5 FCC Rcd 7090, 7094-96 (1990). Reversal is therefore required.

I. **No Procedural Irregularities**

PSN requests a dismissal of the Petition because it was filed on November 24, 1995 -- allegedly "the last day for timely

filed petitions seeking reconsideration" -- was "incomplete," was not properly served on PSN, and was not "corrected" until November 30, 1995 (allegedly "six days after the [filing] deadline"). Opposition at 4-5. PSN's argument mischaracterizes applicable Commission rules, distorts the facts and -- most importantly -- exemplifies PSN's desperate efforts to avoid any objective evaluation of the R&O.

Contrary to PSN's contention, the deadline for filing petitions for reconsideration was 30 days after the R&O was published in the Federal Register, or November 30, 1995 -- not November 24, 1995. See 47 C.F.R. § 1.4(b)(1); 60 Federal Register 55332 (Oct. 31, 1995). Consequently, the "corrected" Petition was timely filed.

PSN's request for dismissal of the Petition would have to be denied even if the filing deadline were November 24, 1995. Again contrary to PSN's assertion, the Petition was not "incomplete" in any common sense meaning of the word. As PSN itself acknowledges, the Petition filed on November 24, 1995 -- the Friday after the Thanksgiving holiday -- contained a few typographical errors and omitted one exhibit (a declaration confirming facts set forth in the text of the Petition concerning driving time between Dunnigan and Sacramento). In no sense can it reasonably be said that the "corrected" document filed on November 30, 1995 constituted an impermissible "supplement."

Nor is there any merit to PSN's contention that service was not proper. As reflected in the declaration of Faye Stedman, annexed hereto as Exhibit 1. EMI's counsel did attempt to serve the Petition on November 24, 1995. In no event, however, has PSN been prejudiced by any alleged delay in service -- thus eliminating whatever merit may have been left to PSN's argument. See Sonderling Broadcasting Corp., 62 FCC2d 303 (1977); Gulf Television Corp., 67 FCC2d 1505 (1978).

II. Dunnigan Move-In Not A Preferential Arrangement

The Petition pointed out that the R&O did not properly apply the three (3) standard criteria to determine whether the Dunnigan move-in is a preferential arrangement. Petition at 14-18. Most of PSN's Opposition, however, explains why Dunnigan is a "community" for allotment purposes -- even though the Petition never challenged Dunnigan's status as a "community." Opposition at 6-9.

By responding to an argument that was never made, PSN apparently hopes to focus Commission attention on an argument which it believes has a high probability of success -- whether Dunnigan is a "community" for allotment purposes -- and divert Commission attention from a claim -- namely, that the Dunnigan move-in is a preferential arrangement -- which is not defensible.

A. The Criterion of Size & Proximity

The Petition pointed out that the commuting time to downtown Sacramento and other areas within the Sacramento

Urbanized Areas would be under one hour. The Petition further observed that "it probably takes Dunnigan residents less time to travel the 40 miles to downtown Sacramento "than it would take Richmond residents to travel the 16 miles on congested roads and a few bridges to San Francisco." Petition at 14. The reference to Richmond was significant since the Commission had concluded in a separate case that competing applicants proposing Richmond over San Francisco could not secure a comparative preference. See Petition at 12-13.

PSN asserts -- without any explanation -- that the reference to the Richmond case is "laughable". Opposition at 10 n.25. The humor in the situation, however, is far from self-evident. There is no reason from any public interest perspective why the 16 miles on congested roads and bridges in the San Francisco area should be treated any differently than the 40 miles over numerous interstate highways which provide ready access to the Sacramento area.

B. Signal Coverage

1. More Realistic Engineering Analysis

The Petition provided a new engineering analysis which demonstrated that PSN's proposed signal would cover all the Davis and Yuba City Urbanized Areas, approximately 225,000 people in the Sacramento Urbanized Area, and an additional 175,000 people through a proposed translator owned by Brett Miller, PSN's broker. PSN does not dispute any of the foregoing facts. Rather

PSN claims that the Commission cannot utilize them in rendering any decision.

PSN contends that the ECAC Terrian-Intergrated Rough Earth Model ("TIREM") propagation procedure reflected in the Petition "has never been acceptable for allotment purposes." Opposition at 12 (emphasis in original). PSN does not and cannot provide any authority to support that broad proposition. As reflected in the declaration of Daniel G. P. Mansergh, annexed hereto as Exhibit 2, TIREM is an acceptable procedure to generate a more accurate assessment of signal coverage in flat terrain like that found in the Dunnigan-Sacramento area.²

PSN's attack on TIREM also flies in the face of the purpose to be served by a preferential allotment. Section 1.420(i) was amended to promote a "fair, equitable and efficient distribution of radio service mandated by Section 307(b) of the Communications Act." New Community of License, 5 FCC Rcd at 7096. That goal could hardly be served by reliance on the predicted method contained in Commission rules when a more accurate engineering analysis shows that the signal coverage would be far

² PSN belittles the Petition's alleged reliance on Subsections 73.313(i) and (j) since those subsections have been stayed by the Commission since May 19, 1977. Opposition at 12 n.30. As explained by Mr. Mansergh in Exhibit 2, however, no reliance was placed on those subsections in preparing his engineering report. Moreover, in staying those subsections, the Commission itself acknowledged that parties can still make supplemental engineering showings. 42 Federal Register 25736 (May 19, 1977).

more extensive and thus enable the proponent to serve the larger central cities near the community of license.

2. Miller's Translator Application

PSN belittles the Petition's observation that PSN's signal coverage will be further enhanced by retransmission by a translator owned by Brett Miller, its broker. According to PSN, Miller "may" retransmit another station's signal and, in any event, is "particularly focused" on using the translator for "RBDS-based messaging." Opposition at 14.

Although other stations may have pressured Miller to carry their particular signal, Miller's application specifies that he will retransmit PSN's station. To EMI's knowledge, Miller has never filed any amendment to that application to specify a different station. Nor is there anything in Miller's translator application to indicate, let alone demonstrate, that his principal purpose is to use the translator for RBDS-based messaging. Indeed, the application makes no reference whatsoever to such a service.³ See Petition, Exh. 3.

C. Dunnigan's Interdependence With Urbanized Areas

PSN claims that the Petition is "recklessly false" in pointing out Dunnigan's dependence on outside areas for

³ MRI and RRI did not acquire their respective stations until after the comment period in the rulemaking had expired. They were therefore unable to file comments concerning the translator's or the station's signal coverage during the comment period. In any event, reliance on the facts set forth in the Petition are essential to any realistic assessment of PSN's proposed move and can thus be taken into account under Section 1.429(b)(3).

employment and basic municipal services. Opposition at 7-11. PSN's bold rhetoric is not supported by the facts. Indeed, if any party has been reckless in the instant proceeding, it is PSN -- not EMI. The latter conclusion is borne out by a review of the eight (8) factors considered in any assessment of interdependence:

Employment -- PSN contends that "Dunnigan residents are likely to be employed locally." Opposition at 10 (second emphasis in original, footnote omitted). However, PSN has not offered any evidence to dispute the Petition's observation -- based on the County Master Plan -- that Dunnigan residents must seek employment in the Urbanized Areas. That latter conclusion is reinforced by an article in The Sacramento Bee which pointed out that future development in Dunnigan contemplates only "a modest commercial presence" and that those moving to Dunnigan can "commute to the Woodland, and Sacramento areas on interstate highways." "'Dunnigan Village' Unveiled," The Sacramento Bee (February 25, 1993), annexed hereto Exhibit 3.

Local Media -- PSN does not dispute the Petition's observation that Dunnigan has no local media and that residents rely on media in the Urbanized Areas. As reflected in Exhibit 4 annexed hereto, The Sacramento Bee has a known circulation of 81 daily newspapers and 85 Sunday newspapers in Dunnigan -- figures which do not take into account papers purchased without a subscription. Those figures assume particular significance since Dunnigan has less than 250 residences.⁴ See Declaration of Eugene Czarny, annexed hereto as Exhibit 4.

Local Government -- PSN does not dispute the Petition's observation that Dunnigan does not have its own local government and elected officials.

Belief in the Existence of a Community -- PSN offers no evidence to support a favorable ruling on this factor

⁴ Annexed hereto as Exhibit 5 is the listing of all 243 telephone numbers in Dunnigan. Even if some telephone numbers are unpublished, that listing indicates that Dunnigan has less than 250 residences.

except to note that some local businesses have "Dunnigan" in their name.

Local Telephone Book and Post Office -- It is undisputed that Dunnigan does not have a local telephone book (but does have its own post office and zip code).

Commercial Establishments, Health Facilities, & Transportation Systems -- PSN does not offer any facts to dispute the Petition's observation that Dunnigan must rely on facilities in the Urbanized Areas and elsewhere for services. PSN nonetheless claims, with much bravado, that the Petition's observation is "incredible" and "unsupportable." PSN's bluster is no substitute for facts. As reflected in Exhibits 6 and 7, for example, Dunnigan residents must rely on the Urbanized Areas for transportation services as well as medical services.

Advertising Market -- Although PSN claims that it did not "concede" that Dunnigan is part of the Sacramento ADI, PSN does not affirmatively challenge that conclusion. See Opposition at 7 n.16.

Police, Fire Protections, Schools, Libraries and Other Municipal Services -- Although many municipal services are provided by nearby communities, Dunnigan residents must rely on Urbanized Areas for certain transportation services (trains and planes) and other municipal services (such as hospital services).

In view of the foregoing, PSN's reliance on Bay St. Louis DA 95-2384 (MMB Dec. 6, 1995), is entirely misplaced. In that case -- which was uncontested -- the Commission approved the licensee's removal from a much smaller community (Poplarville) to a much larger community (Bay St. Louis) because (1) unlike PSN's proposal, the move would not result in any change in population coverage, (2) Bay St. Louis, unlike Dunnigan, has its own local government (including a mayor and city council), (3) unlike Dunnigan, Bay St. Louis has its own police and fire departments, (4) unlike Dunnigan, Bay St. Louis has its own independent school

system, (5) unlike Dunnigan, Bay St. Louis has its own local transportation, and (6) unlike Dunnigan, Bay St. Louis has a substantial number of commercial and social organizations located within the community. Despite all those factors justifying approval of the change, the Commission made the decision reluctantly and only after securing additional information from the proponent. Bay St. Louis thus reflects the Commission's concern that the concept of localism not be applied rigidly and that a careful assessment of relevant factors be made before the Commission approves any licensee's proposal to change its community of license.

CONCLUSION

WHEREFORE, in view of the foregoing and the entire record herein, it is respectfully requested that the Bureau reconsider its decision and rescind the amendment to the Table of Allotments.

Respectfully submitted,

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Attorneys for EMI Sacramento
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By:

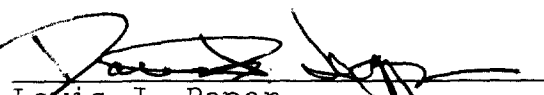

Lewis J. Paper
David B. Jepps

EXHIBIT 1

DECLARATION

Faye Stedman hereby declares as follows:

1. I am a secretary at the law firm of Dickstein, Shapiro & Morin ("DS&M").

2. The first day of my employment at DS&M was November 24, 1995, the day on which the Petition for Reconsideration of Roseville Radio, Inc. and Marysville Radio, Inc. was filed with the Commission. I assisted with the final preparation of the Petition.

3. I deposited the service copy of the Petition with the mail room at DS&M on November 24, 1995. However, because DS&M's office was officially closed on November 24, 1995 for the Thanksgiving Day holiday, the mail room at DS&M did not deliver the service copy to the U.S. Postal service until the following Monday, November 27, 1995.

I declare under penalty of perjury that the foregoing is true and correct.

Faye Stedman

EXHIBIT 2

FM Station KIQS • 105.5 MHz, Channel 288A • Willows, California**Engineering Statement of Daniel G.P. Mansergh**

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Embarcadero Media to address certain technical issues related to projection of coverage for FM stations.

Background

The coverage of TV and FM stations is greatly affected by the nature of the terrain in which the station is located. In flat or gently rolling country, coverage extends approximately the same distance in all directions and is controlled mainly by the power radiated and the height of the transmitting antenna. In such smooth terrain, the simple method of predicting coverage used by the FCC for over forty years provides useful and reasonably accurate maps of coverage. However, for stations located in rough terrain, the FCC-style maps fail to provide a meaningful measure of TV or FM coverage.

To prepare coverage maps that realistically predict coverage, Hammett & Edison, Inc., developed a complete system to determine and show the actual effects of terrain on coverage. This system uses the sophisticated propagation program called the Terrain Integrated Rough Earth Model (TIREM), developed at the Joint Spectrum Center (JSC, formerly ECAC) in Annapolis, Maryland. TIREM uses detailed terrain profiles to compute values of basic transmission loss from point to point. The model evaluates the profile between two sites and, based on the geometry of the profile, selects automatically the most probable mode of propagation from various diffraction models and line-of-sight models. When combined with the United States Geological Survey (USGS) 3-second terrain database, as we have done, the TIREM model is the most accurate known means available for calculating field strength when details of terrain along the propagation path are known.

The map presentation format, which was first copyrighted in 1989 by Hammett & Edison, shows, in addition to the coverage, the locations of population centers taken directly from the 1990 Census of the United States. Each dot on the map is located at the center of each Census Block; the size of each dot is proportional to the number of persons in that Block. The concentrations of population in cities are quite apparent and in some cases even the street patterns of the cities can be discerned.

The maps and population data presented in the Engineering Statement dated November 22, 1995, regarding the allotment of Channel 288A at Willows, California (Mass Media Docket No. 94-29), were derived using this TIREM model.



FM Station KIQS • 105.5 MHz, Channel 288A • Willows, California**Terrain Roughness Factor**

The FCC Rules, in Sections 73.313(i) and (j), describe the procedure for including a "terrain roughness factor" in calculations of "coverage" for FCC allocation purposes. Application of those sections has been stayed indefinitely by Commission action, however, and the maps and population data presented in the Engineering Statement dated November 22, 1995, were not developed using this method.

FCC F(50,50) Curves

The FCC has long utilized for allocation purposes the standard coverage projection curves contained in its Rules in Section 73.333 as Figures 1 and 1A. Those curves, also known as F(50,50) and F(50,10), utilize a simple method of assessing the terrain over which an FM signal must propagate, whereby the extent of coverage, sometimes extending over a hundred kilometers, is calculated entirely by a single number averaging only the terrain elevations of a radial segment 3 to 16 kilometers from the site. In contrast, the TIREM method recognizes that the terrain along the entire path is significant and makes use of detailed terrain profiles derived from digitized databases (such as the USGS 3-second database) for projection of coverage. This factor alone makes the TIREM algorithm better than the F(50,50) curves at predicting FM station coverage. In conjunction with the sophisticated expert system described above, TIREM is a much more accurate coverage prediction method.



Daniel G.P. Mansergh

January 16, 1996



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

960116
Page 2 of 2

Affidavit

State of California

ss:

County of Sonoma

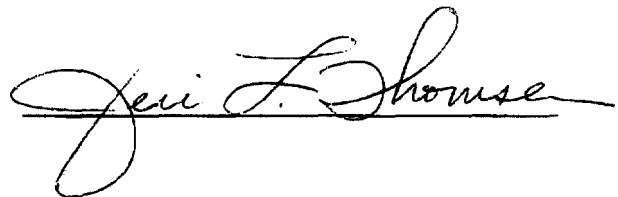
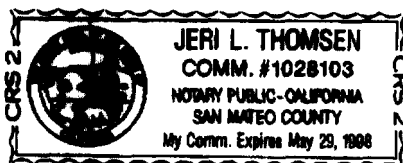
Daniel G.P. Mansergh, being first duly sworn upon oath, deposes and says:

1. That he is a qualified engineer and is employed by the firm of Hammett & Edison, Inc., Consulting Engineers, with offices located near the city of San Francisco, California,
2. That he graduated with honors from the University of California at Santa Cruz with a Bachelor of Arts degree in 1992, completed two years of employment with Apogee Sound, Inc., and has been associated with the firm of Hammett & Edison, Inc., since October 1994,
3. That the firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Embarcadero Media to address certain technical issues related to projection of coverage for FM stations,
4. That such engineering work has been carried out by him or under his direction and that the results thereof are attached hereto and form a part of this affidavit, and
5. That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge except such statements made therein on information and belief and, as to such statements, he believes them to be true.



Daniel G.P. Mansergh

Subscribed and sworn to before me this 16th day of January, 1996



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

960116
Affidavit

EXHIBIT 3

The Sacramento Bee
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Thursday, February 25, 1993

METRO

**'DUNNIGAN VILLAGE' UNVEILED
DEVELOPER PROPOSES UP TO 800 HOMES,
BUSINESS
ZONE IN YOLO HAMLET**
Ted Bell Bee Staff Writer

A Sacramento developer has unveiled a plan for up to 800 houses, a business area, and a park and school in the Yolo County hamlet of **Dunnigan**.

"**Dunnigan** Village" was unveiled Monday evening by Lakemont Development President Ed Johanson before a small gathering in the northeastern Yolo town of about 600 residents adjacent to Interstate 5.

Dunnigan's residents recently settled a sometimes bitter four-year battle and agreed on a draft general plan that calls for up to 600 new residential units over the next 10 years with a modest commercial presence, all packaged around a yet to be built town core.

An environmental impact report has yet to be written for the growth envisioned in the general plan.

Johanson said Wednesday his project would have a market with the proposed development of some agriculture-related

industries in the **Dunnigan** area. He also said those fleeing rising real estate prices in Woodland and Vacaville could commute on I-505, or to Sacramento on I-5.

Johanson said most of the homes would be priced between \$100,000 and \$150,000.

It has long been Yolo County's policy to restrict development to areas inside incorporated cities or to have the growth area annexed by the nearest city.

While the policy has maintained the county's fertile agricultural lands, it has kept the government of a generally prosperous county almost permanently on the edge of financial solvency because of the tiny property tax base in the unincorporated areas.

Earlier this month, Sacramento developer Wayne Stoops said he was abandoning his plan to build a large mall of factory outlet stores near **Dunnigan** because the draft general plan would not allocate him enough land where he wanted it.

---- INDEX REFERENCES ----

KEY WORDS: DEVELOPMENT YOLO CO.

EDITION: METRO FINAL

Word Count: 278

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EXHIBIT 4

DECLARATION OF EUGENE CZARNY

The undersigned, Eugene Czarny, declares as follows:

I am the Circulation Director of *The Sacramento Bee*.

I have first hand knowledge of *The Bee's* circulation records which state that the circulation in the City of Dunnigan, County of Yolo, is 81 daily and 85 Sunday; and that these figures have been verified by the Audit Bureau of Circulation which performed an audit of *The Sacramento Bee* for the 12-month period ending December 31, 1994.

I declare under penalty of perjury, that the above statements are true and correct to the best of my knowledge.

Dated at Sacramento, California, this 21st day of December, 1995.


EUGENE CZARNY

EXHIBIT 5

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THOMAS, DEBRA 1ST DUNNIGAN, CA 95937
916-724-3250
ROSS, S 3050 1ST DUNNIGAN, CA 95937
916-724-0211

WATTERS, ELLEN 3733 1ST DUNNIGAN, CA 95937
916-724-3210
THOMAS, RAY 3755 1ST DUNNIGAN, CA 95937
916-724-3108
LONG, DALE D 3770 1ST DUNNIGAN, CA 95937
916-724-3595
LONG, ERIC 3870 1ST DUNNIGAN, CA 95937
916-724-3359
BALDWIN MINKLER ALMONDS 2 ROAD DUNNIGAN, CA 95937
916-724-0533
CAMPERS INN GOLF COURSE 2501 ROAD #-88 DUNNIGAN, CA 95937
916-724-3350
TOBY LEANA POES BAR B QUE 2660 ROAD #-88 DUNNIGAN, CA 95937
916-724-4230
STRONG, JAMES J 2ND DUNNIGAN, CA 95937
916-724-3245
MAGANA, JOSE 3850 2ND DUNNIGAN, CA 95937
916-724-0233
WILLIAMS, KEITH G 3869 2ND DUNNIGAN, CA 95937
916-724-3323
MCCULLOUGH, VICTOR 3950 2ND DUNNIGAN, CA 95937
916-724-3314
CHURKA, RUDOLPH 1671 ALEXANDR HLL LN DUNNIGAN, CA 95937
916-724-0410
BRITISH PETRO KATHERINE OWENS COUNTY RD 6 DUNNIGAN, CA 95937
916-724-3529
DYER, STEVEN 2 DYER DUNNIGAN, CA 95937
916-724-3456
VALADEZ, L S 3672 HWY 99 W DUNNIGAN, CA 95937
916-724-3537
BHASKAR, MINAXI HWY 99W DUNNIGAN, CA 95937
916-724-4205
HASTINGS, E L HWY 99W DUNNIGAN, CA 95937
916-724-3239
MUMMA, SIDNEY T MAIN DUNNIGAN, CA 95937
916-724-3223
LONG, AARON 29086 MAIN DUNNIGAN, CA 95937
916-724-4126
LARKINS, R 29150 MAIN DUNNIGAN, CA 95937
916-724-3018
KIMBERLIN, LUCY 29270 MAIN DUNNIGAN, CA 95937
916-724-4216
SALAIZ, MARY RAILROAD DUNNIGAN, CA 95937
916-724-3238
TRAVIS, KELLY 3915 RAILROAD DUNNIGAN, CA 95937
916-724-3258
FRAZIER, PAT P RAILROAD ST DUNNIGAN, CA 95937
916-724-3238
ALBISO, ALFONSO G 28095 RD 4 DUNNIGAN, CA 95937
916-724-3516
JONES, BRADY 28100 RD 4 DUNNIGAN, CA 95937
916-724-3300
MURILLO, JOE 28965 RD 4 DUNNIGAN, CA 95937
916-724-3415